

RQ-1

March 23, 2015

DAVID PROFFITT, TREASURER
WP&RS ENTERPRISES POLITICAL ACTION
COMMITTEE
1451 GLOBAL COURT
SARASOTA, FL 34240

Response Due Date 04/27/2015

IDENTIFICATION NUMBER: C00573956

REFERENCE: STATEMENT OF ORGANIZATION

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 2 item(s):

1. The additional text of your Statement of Organization indicates that your committee may be a separate segregated fund; however, you have checked Line 5(f) which indicates that your committee is <u>not</u> a separate segregated fund. Please be advised that a separate segregated fund is a political committee established, financed, maintained or controlled by a corporation, labor organization, membership organization, cooperative or trade association.

If your committee is a separate segregated fund, an amended Statement of Organization should be submitted which indicates the appropriate Type of Committee and Connected Organization on Line 5(e). If your committee is not a separate segregated fund and there are no other committees or organizations with which you share control or financing, please indicate "None" on Line 6. Please amend your Statement of Organization to clarify this discrepancy. (52 U.S.C. §30103(b) (formerly 2 U.S.C. §433(b)) and 11 CFR §102.2)

2. The additional text of your Statement of Organization indicates that "WP&RS Enterprises, LLC," "NuTrae, LLC," and "AltMed, LLC" are the connected organizations for your Committee. Please be advised that a connected organization is any organization which 1) is not a political committee and 2) directly or indirectly establishes, administers, or financially supports a political committee. This type of organization includes a

WP&RS ENTERPRISES POLITICAL ACTION COMMITTEE

Page 2 of 2

corporation, corporation without capital stock, labor organization, membership organization, a cooperative, or a trade association. For further guidance on the question of connected organizations, please refer to 11 CFR §100.6.

If your committee is jointly sponsored by these entities, the full names of these organizations must appear in the name of your committee. (See Advisory Opinions 1988-42 and 1988-14) However, if your committee is not jointly sponsored, and one of these organizations represents a parent company or subsidiary of your connected organization, you need not include its name in the name of your committee. Please provide further clarifying information concerning the relationship between these apparent connected organizations, with regard to your separate segregated fund. In addition, your connected organization should be disclosed on Line 6 of your Statement of Organization. (11 CFR §102.14(c))

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1147.

Sincerely,

Maureen Benitz

on famou Bound

Sr. Campaign Finance & Reviewing Analyst Reports Analysis Division